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July 30, 2025

Hon. Robert Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: Webber, et al. v. Dash, et al
DOCKET NO. 1:19-cv-610-RWL

Dear Hon. Judge Lehrburger:

This office is counsel to the Plaintiffs Josh Webber (“Webber”) and Muddy Water Pictures LLC d/b/a Muddy Water Pictures, Inc. (“Muddy”) (collectively “Plaintiffs”) in this matter. I write today jointly with the consent of the defendants to confirm that Mr. Dash and Poppington turned over to counsel the requisite Assignment of Interest Certificates.

The defendants have not provided the necessary copyrights/films to be given to the US Marshal, however Attorney Bhushan has indicated that links or digital copies of the films/copyrights will be provided by the close of business on August 7, 2025 for the films (1) Honor Up and (2) Too Honorable, and will provide copies of requests to the United States Copyright Office for depository copies of the remaining copyrights identified in the Assignment of Interest at Exhibit A, before August 7, 2025.

In light of this partial compliance, we respectfully request that the Court dispense with the Order to Show Cause hearing scheduled for July 31, 2025 at 10:00 am, and resent the date of August 8, 2025 at 10:00 am, to confirm the delivery of the films/copyrights to be provided to the US Marshal by the defendants.

We thank the Court for its attention to this matter.

Sincerely,
Brown & Rosen LLC

Christopher Brown

Christopher L. Brown

Cc: All parties via ECF

EXHIBIT A

**ASSIGNMENTS BY DAMON DASH AND POPPINGTON PER COURT ORDER
To The U.S. Marshal for the SDNY**

WHEREAS, pursuant to an Order issued by the United States District Court, Southern District of New York in Webber v Dash 19-cv-1610 dated (Hon. Robert Leibrburger, U.S.M.J.) it was Ordered that Damon Dash and Poppington LLC's (collectively, the "Parties") interests in the following entities and copyrights were to be assigned to the US Marshal:

Entities:

a. Dash Films Inc.; inclusive of the Dash Films Inc. copyrights identified below:

#	Full Title	Date	Copyright Number
1	Philly Streets;unpublished screenplay /By Adam Morenoff p.k.a. Adam Moreno p.k.a. Blue, as a work-made-for-hire for Philly Productions, Inc. State property :f.k.a. Get down or lay down;feature film & screenplay	2004-02-03	V3507D074
2	Screenplay written by Ernest "Tron" Anderson. Additional title: Philly streets; f.k.a. State property 2.	2004-05-18	V3509D570
3	Philly Streets;unpublished screenplay /By Adam Morenoff, p.k.a. Adam Moreno p.k.a. Blue. Philly Streets :a.k.a. State property 2, a.k.a.	2004-01-29	V3506D626
4	Get down, or Lay down /Feature film. Screenplay written by Enrest Tron Anderson.	2004-08-06	V3516D268

And,

- b. Bluroc LLC d/b/a Bluroc Records LLC;
- c. Blakroc LLC;
- d. Any interest Dash owns in Lebanon Improvements LLC;
- e. Any interest Dash owns in Ocean East Improvements LLC; and,
- f. Any interest Dash owns in 1996 Songs LLC.

The copyrights of Poppington LLC as follows:

	Company	Title	Registration Number	Year
[1]	Poppington, LLC	<u>Honor Up & 1 other title; motion picture.</u>	V9960D594	2018
[2]	Poppington, LLC	<u>Too honorable & 1 other title; motion picture.</u>	V9963D188	2017
[3]	Poppington, LLC	<u>Too honorable; motion picture.</u>	V9944D865	2017
[4]	Poppington, LLC	<u>Too honorable; motion picture.</u>	V9944D864	2017
[5]	Poppington, LLC	<u>We Went To...China and 2 other titles.</u>	V9962D993	2018
[6]	Poppington, LLC	<u>Welcome to Blackroc & 2 other titles; motion picture.</u>	V9929D973	2015
[7]	Poppington, LLC	<u>Welcome to Blackroc & 2 other titles; ; motion picture.</u>	V9929D974	2015
[8]	Poppington, LLC	<u>Welcome to Blackroc & 2 other titles; ; motion picture.</u>	V9929D975	2015

Copies of all intellectual property filed in the United States Copyright Office are provided.

WHEREAS, in compliance with said Order, the Parties hereby assign to the U.S. Marshal all of their right, title and interest, free of any encumbrances, payments or liens in and to the foregoing interests strictly for the limited purpose of selling this at public auction.

NOW THEREFORE, Damon Dash, individually, and on behalf of Poppington LLC hereby TRANSFERS AND ASSIGNS to the U.S. Marshal all of their right, title and interest in and to the Dash Ownership Interest.

Damon Anthony Dash

Damon Dash

ACKNOWLEDGMENT

Nevada)
State of Nevada)
County of Clark) ss.:

On the 07/30/2025 day of July in the year 2025 before me, the undersigned, a Notary Public in and for said State, personally appeared Damon Dash known personally to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies) and that by his/her/their signature(es) on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument.

Carlos Pittman
Notary Public

Carlos Pittman

